



Christopher T. Rice  
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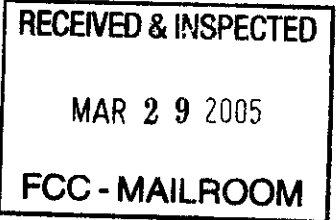
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March 25, 2005

Mr. Jeffrey A. Citron  
Chairman & CEO  
Vonage Holdings Corp.  
2147 Route 27  
Edison, NJ 08817

ORIGINAL



Re: E-911 Emergency Services

Dear Mr. Citron,

This is in response to your letter received in Mr. Whitacre's office on February 28, 2005, regarding VoIP E-911 emergency service. SBC would welcome the opportunity to have its 911 experts meet with Vonage to explain SBC's current 911 offerings and to discuss with you our future plans in this area. SBC has been providing dependable, high-quality 911 capabilities for decades. SBC is fully committed to developing the means of providing these same capabilities over IP-enabled platforms, to ensure the safety and well being of its customers and the communities it serves.

We cannot agree, however, to participate in a separate, proprietary trial with Vonage, which is just one of many companies that provide, or will in the near future provide, voice over Internet protocol services. SBC, and other industry participants, have already expended considerable resources in attempting to develop an industry-wide solution in this area. SBC cannot agree to engage in numerous individual tests with each and every VoIP service provider. SBC does not believe that proprietary VoIP 911 trials will result in an optimal industry-wide solution. Indeed, Vonage, itself, has recognized the critical importance of "allow[ing] the VoIP industry the opportunity to develop industry standards to effectuate 911/E911 service" and has argued to the FCC that giving "the industry this time and flexibility will ensure that the system developed is the best one possible and most viable for long-term changes of the Nation's network infrastructure." Vonage Comments at 38, WC Docket No. 04-36 (FCC May, 28, 2004). SBC agrees with this view, and each company's pursuit of its own, proprietary solution is clearly not the way to develop the best system possible or the one most flexible to respond to long-term changes in the IP infrastructure.

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Moreover, proprietary trials are expensive, can be disruptive to operations, can be demanding on limited resources, and have the potential to interfere with the development of national standards. SBC is committed, instead, to finding a solution that will ensure that it can consistently and effectively accommodate VoIP technologies across its region by delivering accurate ANI and ALI information to the correct PSAP, regardless of which VoIP provider the customer uses.

As with most new technologies, finding solutions to conventional challenges using new technologies requires research, industry cooperation, and the development of comprehensive standards. In the particular case of VoIP, the solutions for providing reliable and cost-effective 911 services are not easy given the nature of IP technology. The unique features and capabilities that make VoIP a flexible and (perhaps of greatest significance) a portable service also make it hard to emulate traditional 911 service capabilities. Nonetheless, SBC is working diligently on its own, and with industry groups and other companies to develop 911 solutions and standards that will work effectively for all stakeholders.

For example, SBC is working collaboratively with Telcordia and other carriers to develop standard interfaces for IP-based voice providers to accurately deliver 911 calls to the appropriate PSAPs, regardless of the particular IP-based technology employed. Within the past few months, Telcordia has issued generic requirements for some of the major components of the "i2" architecture. Industry groups have the opportunity to comment on these specifications and on others that will follow.

In addition, SBC will continue to take an active role in the development and acceptance of industry interface standards. SBC is actively engaged with the Alliance for Telecommunication Solutions (ATIS), the Emergency Services Interconnection Forum (ESIF) and the National Number Emergency Association (NENA) to ensure the adoption of national standards. In fact, this week, NENA will be holding its 11th Annual Technical Development Conference in San Jose, California, and the future design of E-911 will be a main topic for discussion. SBC remains committed to the establishment and acceptance of national standards on 911 emergency services, and it will continue to participate in national trials that test the implementation of these national standards.

SBC welcomes Vonage's input into these industry-wide processes and encourages Vonage to join in these collaborative efforts rather than to focus on its own, proprietary solutions. SBC would be happy to help facilitate Vonage's joining these various activities and groups.

In the meantime, SBC has a 911 solution available to VoIP providers today whose customers reside in a single registered location. SBC is also working on a product called Switched IP Service which makes 911 features available. We still have some work to do before the product is ready for deployment. If you wish to discuss these products, please contact us.

Once again, we would like to encourage Vonage to meet with us to discuss our current 911 offer and our plans for further development. SBC continues to believe that working towards an industry-wide solution would be the most productive use of our collective resources, and Vonage's active participation in these forums could prove extremely helpful.

Sincerely,

A handwritten signature in black ink, reading "Christopher T. Rice". The signature is fluid and cursive, with the first name "Christopher" written in a larger, more prominent script than the last name "Rice".

Christopher T. Rice  
Executive Vice President  
Network Planning & Engineering

cc: Kevin J. Martin, Chairman, FCC  
Kathleen Q. Abernathy, FCC Commissioner  
Michael J. Copps, FCC Commissioner  
Jonathan S. Adelstein, FCC Commissioner  
Gregory S. Ballentine, President, APCO International  
The Honorable Hillary Rodham Clinton  
The Honorable John Shimkus  
The Honorable Anna Eshoo  
The Honorable Conrad Burns  
The Honorable Kay Bailey Hutchison  
The Honorable Barbara Boxer  
The Honorable Joe Barton  
The Honorable John D. Dingell